

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

Plaintiff

v.

C.A. No. 1:21-cv-01456-GBW

CHANBOND, LLC,

Defendant

and

DIERDRE LEANE and IPNAV, LLC,

Defendants.

JOINT STATUS REPORT

Pursuant to the Court’s June 8, 2023 Order [D.I. 220], Plaintiff CBV, Inc. (“CBV”), Defendants Deirdre Leane and IPNAV, LLC (“Leane Defendants”), and ChanBond, LLC (“ChanBond” and, collectively, the “Parties”) respectfully submit this joint status report.

1. The Parties agree that in light of the Court’s prior rulings and the parties’ respective settlements, there are no claims remaining to be tried. CBV, however, believes that it has a basis for, and wishes to preserve its right to, appeal. Specifically, CBV anticipates the parties entering a stipulated final, appealable judgment substantively resolving the declaratory judgment claims brought by CBV (Counts V and VI of CBV’s First Amended Complaint [D.I. 6]) and by Leane Defendants (Count I of Leane Defendants’ Counterclaim [D.I. 41]), consistent with the Court’s October 5, 2022 Memorandum Opinion [D.I. 151].

2. As such, the Parties respectfully ask the Court to adjourn the currently scheduled trial, and all associated dates, *sine die* in order to allow the parties to negotiate an appropriate

stipulated judgment that may include dismissal of certain of Leane Defendants' counterclaims without prejudice.

3. Upon the issuance of the stipulated judgment, the Court may deny the Leane Defendants' Motion for Judgment on the Pleadings [D.I. 104] as moot.

Dated: June 16, 2023

Respectfully submitted,

**BUCHANAN INGERSOLL &
ROONEY PC**

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